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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

GREGORY DANAHER,  
Plaintiff,

vs.

VISION FINANCIAL CORP,  
Defendant.

Case No.: 2:13-cv-02212-APG-VCF

**JOINT DISCOVERY PLAN AND  
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH  
LR 26-1(e)**

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule of Practice 26-1, the parties, by and through their respective counsel of record, hereby stipulate to and request that the Court enter the following discovery plan and scheduling order:

1. Pre-Discovery Disclosures: The parties hereby stipulate that they shall make their initial disclosures of information required by Fed. R. Civ. P. 26 (a)(1) by May 27, 2014.

2. Areas of Discovery: Discovery will be needed on all issues including, but not limited to, all claims and defenses within the scope of the pleadings.

3. Discovery Cut-Off Date: Discovery shall take one hundred seventy-eight (178) days, measured from April 3, 2014, which is the date the first defendant answered or otherwise appeared in the case. This does not exceed the one hundred eighty (180) presumptive outside limit LR 26-1(e)(1) sets for completing discovery. Accordingly, all discovery must be commenced in time to be completed by **Friday, September 30, 2014**.

1           4.     Fed. R. Civ. P. 26(a)(2) Disclosures (Experts): Disclosure of experts shall  
2 proceed according to Fed. R. Civ. P. 26(a)(2), except that:

3                     [i]     The disclosure of experts and expert reports shall occur on Friday,  
4                             August 1, 2014, which is sixty (60) days before the discovery cut-  
5                             off date; and

6                     [ii]    The disclosure of rebuttal experts and their reports shall occur on  
7                             Friday, August 29, 2014, which is twenty-eight (28) days after the  
8                             initial disclosure of experts.  
9

10          5.     Other Items:

11                     a.     Amending the Pleadings and Adding Parties: The parties shall have until  
12 Wednesday, July 2, 2014, to file a[ny] motion[s] to amend the pleadings or to add parties. This  
13 is ninety (90) days before the discovery cut-off date and does not exceed the outside limit LR 26-  
14 1(e)(2) presumptively sets of not less than ninety (90) days prior to the close of discovery for  
15 filing such motions.  
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17                     b.     Interim Status Report: The parties shall file the interim status report  
18 required by LR 26-3 by Friday, August 1, 2014. The undersigned counsel certify that they have  
19 read LR 26-3 and that this date is no later than sixty (60) days before the discovery cut-off date.  
20

21                     c.     Dispositive Motions: The parties shall have until Thursday, October 30,  
22 2014 to file dispositive motion(s). This is thirty (30) days after the discovery cut-off date and  
23 does not exceed the outside limit of thirty (30) days following the discovery cut-off date that LR  
24 26-1(e)(4) presumptively sets for filing dispositive motions.

25                     d.     Settlement. The parties have discussed settlement, but have been unable  
26 to reach an agreement at this time.

27                     e.     Pretrial Order: The joint pretrial order shall be filed by Friday, November  
28 28, 2014, which is not later than twenty-nine (29) days after the date set for filing dispositive

1 motions in this case. In the event a timely dispositive motion is filed, the deadline to submit the  
2 joint pretrial order shall be suspended until thirty (30) days after the decision on the dispositive  
3 motion or further order of the Court. The disclosures required by Fed. R. Civ. P. 26(a)(3) shall  
4 be made in the joint pretrial order.

5  
6 f. Later Appearing Parties: A copy of this discovery plan and scheduling  
7 order shall be served on any person served after it is entered or, if additional defendants should  
8 appear, within five (5) days of their first appearance. This discovery plan and scheduling order  
9 shall apply to such later appearing part[y][ies], unless a stipulation of the parties is approved by  
10 the Court or the Court, on motion for good cause shown, orders otherwise.

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g. Extensions or Modifications of the Discovery Plan and Scheduling Order:

LR 26-4 governs modifications or extensions of this discovery plan and scheduling order. Any stipulation or motion must be made not later than twenty-one (21) days before the discovery cut-off date, which is Tuesday, September 9, 2014, and comply fully with LR 26-4.

**AGREED AND ACCEPTED:**

**Plaintiff:**

**Defendant:**

DATED this 19th day of May, 2014

DATED this 19th day of May, 2014

THE BOURASSA LAW GROUP, LLC.

LINCOLN GUSTAFSON AND CERCOS

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**IT IS SO ORDERED:**

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

DATED: \_\_\_\_\_  
CASE NO.: 2:13-cv-02212-APG-VCF